

PENELOPE A. PREOVOLOS (CA SBN 87607)
PPreovolos@mofo.com
ANDREW D. MUHLBACH (CA SBN 175694)
AMuhlbach@mofo.com
STUART C. PLUNKETT (CA SBN 187971)
SPlunkett@mofo.com
HEATHER A. MOSER (CA SBN 212686)
HMoser@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Telephone: 415.268.7000
Facsimile: 415.268.7522

E-FILED - 11/30/10

Attorneys for Defendant
APPLE INC.

[Additional Joining Counsel on Signature Pages]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE APPLE IPHONE 4 PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

Goodlick - Case No. 5:10-2862
Benvenisty - Case No. 5:10-2885
Dydyk - Case No. 5:10-2897
Rodgers - Case No. 5:10-2916
Popik - Case No. 5:10-2928
Tietze - Case No. 5:10-2929
Fasano - Case No. 5:10-3010
Mayo - Case No. 5:10-3017
Aguilera- Case No. 5:10-3056
Noble - Case No. 5:10-3957
Milrot - Case No. 5:10-4117
Deroose - Case No. 5:10-4273

Case No. 5:10-md-02188-RMW

**JOINT STIPULATION EXTENDING
TIME TO RESPOND TO
COMPLAINTS;
[] ORDER**

The Hon. Ronald M. Whyte

1 WHEREAS, the twelve above-captioned proposed class actions brought on behalf of
 2 iPhone 4 users have been related in the Northern District of California under Civil L.R. 3-12
 3 before the Hon. Ronald M. Whyte;

4 WHEREAS, on October 8, 2010, the United States Judicial Panel on Multidistrict
 5 Litigation (“JPML”) issued an Order transferring four additional actions to the Northern District
 6 of California and assigning the matters to the Honorable Ronald M. Whyte for coordinated or
 7 consolidated pretrial proceedings;¹

8 WHEREAS, Defendant Apple Inc. has been granted previous extensions to file responsive
 9 pleadings to the complaints, up through and including November 15, 2010, in the above captioned
 10 matters;

11 WHEREAS, Defendant AT&T Mobility LLC (“ATTM”) has been granted previous
 12 extensions to file responsive pleadings to the complaints, up through and including November 15,
 13 2010, in *Goodlick* and *Popik*, the cases in which it has been named as a defendant and served
 14 with the complaint;

15 WHEREAS, the parties have agreed that the deadline for any and all responsive pleadings
 16 currently due should be extended by 30 days to December 15, 2010;

17 WHEREAS, the stipulated extension will not alter the date of any event or deadline
 18 already fixed by the court;

19 NOW THEREFORE, Plaintiffs and Defendants, through their counsel of record, stipulate
 20 to the following:

21 IT IS HEREBY STIPULATED that Apple’s responsive pleadings to the complaints (or
 22 amended complaints, as applicable) in the above-captioned cases and ATTM’s responsive
 23 pleadings to the complaints (or amended complaints, as applicable) in *Goodlick* and *Popik* shall
 24 be extended up through and including December 15, 2010.

25
 26 ¹ The Transfer Order includes the following four actions: *Gionis v. Apple Inc., et al.* Case No.
 27 1:10-11110 (D. Mass.); *McCaffrey v. Apple Inc., et al.* Case No. 1:10-1776 (D. Md.); *Purdue v.*
 28 *Apple Inc. et al.* Case No. 3:10-687 (M.D. Tenn); and *Nguyen v. Apple Inc.*, Case No. 3:10-252
 (S.D. Tex.).

IT IS SO STIPULATED:

Dated: November 9, 2010

PENELOPE A. PREOVOLOS
ANDREW D. MUHLBACH
STUART C. PLUNKETT
HEATHER A. MOSER
MORRISON & FOERSTER LLP

By: /s/ Stuart C. Plunkett
Stuart C. Plunkett
Attorneys for Defendant
APPLE INC.

Dated: November 9, 2010

KATHLEEN TAYLOR SOOY
M. KAY MARTIN
JOEL D. SMITH

By: /s/ Kathleen Taylor Sooy
Kathleen Taylor Sooy
Attorneys for Defendant
AT&T MOBILITY LLC

CROWELL & MORING LLP
275 Battery Street, 23rd Floor
San Francisco, CA 94111
Telephone: (415) 986-2800
Facsimile: (415) 986-2827
mmartin@crowell.com
jsmith@crowell.com

CROWELL & MORING LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004
Telephone: (202) 624-2500
Facsimile: (202) 628-5116
ksooy@crowell.com

1 Dated: November 9, 2010

KERSHAW CUTTER & RATINOFF LLP

2
3 By: /s/ William A. Kershaw

William A. Kershaw

Attorney for Plaintiffs

MICHAEL JAMES GOODGLICK, ET
AL.

6 KERSHAW CUTTER & RATINOFF LLP

401 Watt Avenue

Sacramento, CA 95684

Tel: 916-448-9800

Fax: 916-669-4499

Email: wkershaw@kcrlegal.com

10 Dated: November 9, 2010

GARDY & NOTIS LLP

12 By: /s/ Jennifer Sarnelli

Jennifer Sarnelli

Attorney for Plaintiffs

ALAN BENVENISTY, ET AL.

16 GARDY & NORIS LLP

560 Sylvan Avenue

Englewood Cliffs, NJ 07632

Tel: 201-567-7377

Fax: 201-567-7337

Email: jsarnelli@gardylaw.com

1 Dated: November 9, 2010

RAM & OLSON LLP

2
3 By: /s/ Michael Ram

Michael Ram

Attorney for Plaintiff

CHRISTOPHER DYDYK

4
5
6 RAM & OLSON

555 Montgomery Street, Suite 820

San Francisco, CA 94111

Tel: 415-433-4949

Fax: 415-433-7311

Email: mram@ramolson.com

7
8
9
10 Dated: November 9, 2010

SHUBLAW LLC

11
12 By: /s/ Jonathan Shub

Jonathan Shub

Attorney for Plaintiff

JEFFREY RODGERS

13
14
15 SHUBLAW LLC

1818 Market Street, 13th Floor

Philadelphia, PA 19106

Tel: 610-453-6551

Fax: 215-569-1606

Email: jshub@shublaw.com

16
17
18
19 Dated: November 9, 2010

KIRTLAND & PACKARD LLP

20
21 By: /s/ Michael Louis Kelly

Michael Louis Kelly

Attorney for Plaintiff

DAVID POPIK

22
23
24 KIRTLAND & PACKARD LLP

2361 Rosecrans Avenue, Fourth Floor

Segundo, CA 90245

Tel: 310-536-1000

Fax: 310-536-1001

Email: mlk@kirtlandpackard.com

El

1 Dated: November 9, 2010

ROTHKEN LAW FIRM

2
3 By: /s/ Ira P.Rothken

Ira P. Rothken

Attorney for Plaintiff

STEVE TIETZE

6 ROTHKEN LAW FIRM

3 Hamilton Landing Ste 280

Novato, CA 94949

Tel: 415-924-4250

Fax: 415-924-2905

Email: ira@techfirm.com

10 Dated: November 9, 2010

FARUQI & FARUQI LLP

12 By: /s/ Vahn Alexander

Vahn Alexander

Attorney for Plaintiff

CHARLES FASANO

15 FARUQI & FARUQI LLP

1901 Avenue of the Stars, Second Floor

Los Angeles, CA 90067

Tel: 310-461-1426

Fax: 310-461-1427

Email: valexander@faruqilaw.com

1 Dated: November 9, 2010

SHEPARD, FINKELMAN, MILLER &
SHAH LLP

2
3 By: /s/ Rosemary Farrales Luzon
4 Rosemary Farrales Luzon
5 *Attorney for Plaintiff*
A. TODD MAYO

6
7 SHEPARD, FINKELMAN, MILLER &
SHAH LLP
8 401 West A Street, Suite 2350
San Diego, CA 92101
9 Tel: 619-235-2416
Fax: 619-234-7334
10 Email: rluzon@sfmslaw.com

11 Dated: November 9, 2010

WEXLER WALLACE LLP

12
13 By: /s/ Mark J. Tamblyn
14 Mark J. Tamblyn
15 *Attorney for Plaintiff*
GREG AGUILERA, II

16 WEXLER WALLACE LLP
17 455 Capitol Mall, Suite 231
Sacramento, CA 95814
18 Tel: 916-492-1100
Fax: 916-492-1124
19 Email: mjt@wexlerwallace.com
20
21
22
23
24
25
26
27
28

1 Dated: November 9, 2010

ROBBINS GELLER RUDMAN & DOWD
LLP

3 By: /s/ Stuart A. Davidson

4 Stuart A. Davidson

Attorney for Plaintiff

5 CHRISTOPHER DEROSE AND
6 STACY MILROT

7 ROBBINS GELLER RUDMAN & DOWD
LLP

8 120 E. Palmetto Road, Suite 500

9 Boca Raton, FL 33432

Tel: 561-750-3000

10 Fax: 561-750-3364

Email: sdavidson@rgrdlaw.com

12 Dated: November 9, 2010

AMAMGBO & ASSOCIATES

14 By: /s/ Donald Amamgbo

Donald Amamgbo

Attorney for Plaintiff

16 ZETHA NOBLE

17 AMAMGBO & ASSOCIATES

18 7901 Oakport, Suite 4900

Oakland, CA 94621

19 Tel: 510-615-6000

Fax: 510-615-6025

20 Email: donald@amamgbolaw.com

21 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
22 "conformed" signature (/S/) within this e-filed document.

23 Dated: November 9, 2010

STUART C. PLUNKETT
MORRISON & FOERSTER LLP

25 By: s/ Stuart C. Plunkett

26 STUART C. PLUNKETT

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Defendants' responsive pleadings to the complaints (or amended complaints, as applicable) in the above-captioned cases shall be extended up through and including December 15, 2010.

Dated: November 30, 2010

By: 
The Honorable Judge Ronald M. Whyte